

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

COOK LOGISTICS, LLC,
a Wisconsin limited liability company,
individually and as assignee of HITEC
POWER PROTECTION, INC.,

Plaintiff,

Case No. 2019-CV-1620

v.

EQUIPMENT EXPRESS, INC.
a Canadian corporation,

Defendant.

NOTICE OF MOTION AND MOTION TO DISMISS

PLEASE TAKE NOTICE, Defendant, Equipment Express, Inc., by and through its undersigned counsel, hereby move the Court, the Magistrate Judge William E. Duffin presiding, for an Order granting dismissal under the doctrine of *forum non conveniens*, or, in the alternative, based on lack of personal jurisdiction and/or improper venue under the Carmack Amendment and Federal Rule of Civil Procedure 12(b)(2)-(b)(3) for the reasons identified in the accompanying Memorandum in Support of Defendant's Motion to Dismiss.

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP**
Attorneys for Equipment Express, Inc.

/s/ Patricia A. Stone

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